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11 Attorneys for Debtors

12
13 UNITED STATES BANKRUPTCY COURT

14 DISTRICT OF OREGON

15 In re

16 NORPAC Foods, Inc. [TIN 9330],
17 Hermiston Foods, LLC [TIN 3927], and
18 Quincy Foods, LLC [TIN 7444],

19 Debtors.

Case No. 19-62584-pcm11

LEAD CASE

(Jointly Administered with Case
Nos. 19-33102-pcm11 and
19-33103-pcm11)

**MOTION TO RESCHEDULE
HEARING ON DEBTORS' MOTION
TO REJECT COLLECTIVE
BARGAINING AGREEMENTS**

22 Pursuant to LBR 7007-1(c) made applicable by LBR 9013-1, Debtors hereby
23 request a rescheduled and expedited hearing on their Motion to Reject Collective Bargaining
24 Agreements ("Motion to Reject") [ECF No. 242]. Debtors' counsel has conferred with counsel
25 for Teamsters Local Unions 324, 670, and 760 ("Teamsters Locals") but has been unable to
26 reach agreement on rescheduling the hearing.

1 Debtors' Motion to Reject Collective Bargaining Agreements was filed on
2 October 14, 2019 [ECF No. 242]. Objections were due on or before October 25, 2019.
3 Teamsters Locals filed their response on October 25, 2019 [ECF No. 301]. No other responses
4 or objections have been filed.

5 The final hearing on the Motion is scheduled for February 12, 2020.

6 On January 10, 2020, Teamsters Locals filed an objection to Debtors' Motion for
7 Authority to Sell Property to Lineage Master RE, LLC ("Lineage"). Teamsters Locals want the
8 closing of the sale to Lineage to be conditioned on compliance by Debtors with Section 1113 of
9 the Bankruptcy Code. As set forth in Debtors' Response to Teamsters Local Unions' Limited
10 Objection to Debtors' Notice of Intent to Sell Real or Personal Property [ECF No. 545], Debtors
11 have complied with Section 1113 of the Bankruptcy Code. Debtors will present evidence of
12 their compliance at the hearing scheduled for January 14, 2020. The sale to Lineage is crucial to
13 Debtors' ability to pay all of their secured creditors and confirm a plan of reorganization that will
14 enable Debtors to make distributions to unsecured creditors. Any delay in the closing will cause
15 harm to Debtors and the estate.

16 Debtors hereby move this Court for an Order rescheduling the hearing currently
17 scheduled for February 12, 2020 to the earliest available date.

18 DATED this 13th day of January, 2019.

19 TONKON TORP LLP
20

21 By /s/ Albert N. Kennedy

22 Albert N. Kennedy, OSB NO. 821429

23 Timothy J. Conway, OSB No. 851752

24 Michael W. Fletcher, OSB No. 010448

25 Ava L. Schoen, OSB No. 044072

26 Attorneys for Debtors

EXHIBIT 1

PROPOSED FORM OF ORDER

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re

NORPAC Foods, Inc. [TIN 9330],
Hermiston Foods, LLC [TIN 3927], and
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Debtors.

Case No. 19-62584-pcm11
LEAD CASE

(Jointly Administered with Case
Nos. 19-33102-pcm11 and
19-33103-pcm11

**ORDER GRANTING MOTION FOR
RESCHEDULED HEARING ON
DEBTORS' MOTION TO REJECT
COLLECTIVE BARGAINING
AGREEMENTS**

THIS MATTER came before the Court on January 14, 2020 and good cause
appearing therefor;

IT IS HEREBY ORDERED that the final hearing on Debtors' Motion to Reject
Collective Bargaining Agreements is scheduled for _____, 2020.

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I certify that I have complied with the requirements of LBR 9021-1(a).

Presented by:

TONKON TORP LLP

By _____
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cc: List of Interested Parties